

**Before the
FEDERAL COMMUNICATIONS COMMISSION**
Washington, DC

In the matter of:)
)
In re: Delete Delete Delete) GN Docket No. 25-133
)
)

MOTION FOR EXTENSION OF TIME

REC Networks (“REC”) is a leading advocate for various FCC regulated services including those that are handled in Parts 15, 73, 74, 95 and 97. REC’s objectives include citizen’s access to spectrum, keeping radio relevant, more choices and more voices, improving the rural quality of life, promoting emergency alerting at the small station level and digital equity.¹ REC is best known for our work to promote the Low Power FM (LPFM) radio service.

As REC’s constituency includes interests from several regulated services, we will be very deeply involved in this proceeding and is already working on identifying regulations that can be deleted or modified to address the issues that such regulations create and to do so in concert with the recent Executive Orders.

The current deadline for comments is April 11, 2025.² The National Association of Broadcasters has their annual conference and exhibition at the Las Vegas Convention Center (“NABSHOW”) from April 5 through April 9, 2025 with many of us traveling on April 10, 2025.³ The 2024 NABSHOW attracted 65,000 registered attendees and nearly 1,300 exhibitors.⁴

During NABSHOW, REC, as well as others use this time to discuss issues with broadcasters, manufacturers and other advocates who represent the best interests of broadcasting, telecommunications and content creation. These discussions can present new insights to issues for which regulations that need to be deleted or otherwise modified can be identified. The limited amount of time from the close of the NABSHOW to the comment deadline will place a major burden on some participants in this proceeding to be able to process the new information provided as a result of consultations that took place during NABSHOW.

¹ <https://recnet.com/objectives>

² See *In Re: Delete Delete Delete*, Public Notice, DA 25-219 (Mar. 12, 2025).

³ <https://www.nabshow.com/>

⁴ See *Big Names, Big Brands, Big Announcements at the 2024 NAB Show*, National Association of Broadcasters, press release, <https://nab.org/documents/newsroom/pressRelease.asp?id=6972> (Retrieved March 20, 2025).

In order to assure that there is a full and complete record in this proceeding, it is REC's position that it would be in the public interest to extend the comment period by four weeks to Friday, May 9, 2025. This will provide significant additional time for those who attended NABSHOW as well as other industry-related conferences during this period to be able to provide well-written and compelling input into this proceeding.⁵

The current Reply Comment deadline is April 28, 2025, the first business day after 15 days from the comment deadline. We note that this proceeding has received a lot of coverage and attention and so far, has generated 148 comments filed in the Commission's Electronic Comment Filing System. It is our position that with the progression of time, the number of comments received will increase dramatically. Also, since this proceeding is not centered around a single service, it will take additional time for those who plan to participate in the Reply Comment phase to be able to determine which comments are for services for which they represent the interests in or otherwise advocate for. For that reason, it would be in the public interest to extend the Reply Comment period to thirty (30) days. If the comment deadline is extended to May 9, 2025, this would place the Reply Comment deadline at June 9, 2025.

Because of the vast depth of the subject matter involved, subject matter that spans to all Commission regulated services and due to the schedule of the NABSHOW conferences and exhibition, which represents a significant portion of those Commission regulated services, it is REC's position that it would be in the public interest to extend the Comment and Reply Comment periods in this proceeding to assure the maximum participation in this proceeding, including those that may arise during NABSHOW, the NTCA Legislative and Policy Conference, and likely at other events in the various industries that the Commission regulates.

With that, REC Networks is motioning for an extension of time in this proceeding to extend the Comment deadline to May 9, 2025 and the Reply Comment deadline to June 9, 2025.

Respectfully submitted,

/S/

Michelle Bradley, CBT
Founder
REC Networks

March 20, 2025

⁵ We also note that from April 27 to April 29, 2025, NTCA-The Rural Broadband Association ("NTCA") will be holding their 2025 Legislative and Policy Conference in Washington, DC (<https://www.ntca.org/learn/events/legislative-policy-conference>).